

EXHIBIT D

WSOU Investments, LLC D/B/A Brazos Licensing And Development v. Google LLC, Case No. 6:20-cv-584
Exhibit 6-[Nokia Demo] -- Invalidity of U.S. Patent No. 8,803,697

Invalidity of U.S. Patent No. 8,803,697 under 35 U.S.C. § 102 and/or § 103 by Nokia Demo

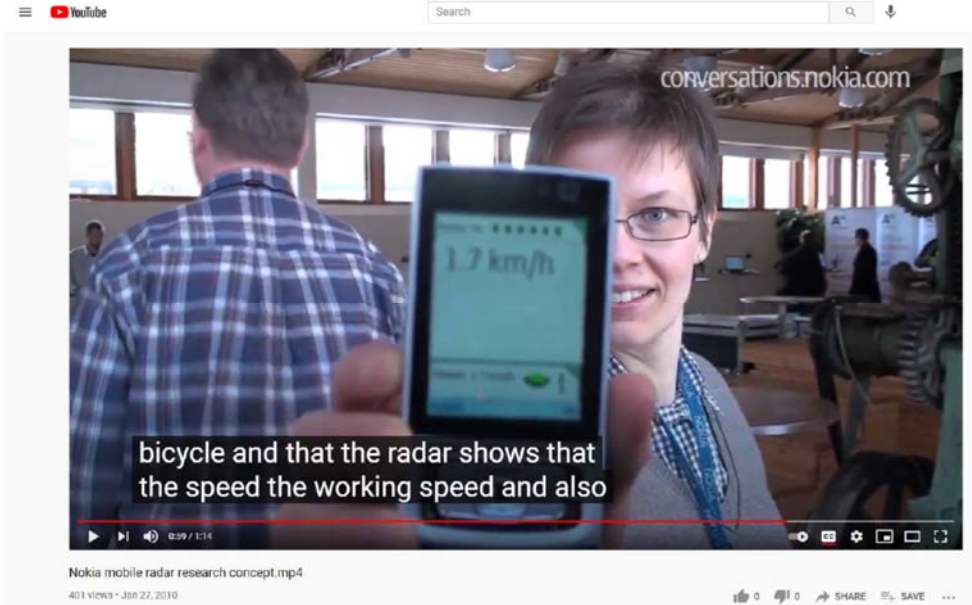
The following claim chart demonstrates Google's current contentions regarding the invalidity of U.S. Patent No. 8,803,697 ("the '697 patent") over the Nokia mobile radar video system publically demonstrated and published to YouTube at <https://www.youtube.com/watch?v=DPzs5F-NN-Q> ("the Nokia Demo") and/or the Nokia Demo in view of U.S. Patent Application Publication No. 2008/0134102 ("Movold") and/or Korean Laid-open Publication No. 10-2010-0024552 ("Kim") and/or U.S. Patent Application Publication No. 2009/0167542 ("Culbert") and/or U.S. Patent Application Publication No. 2007/0075965 ("Huppi"), and/or the knowledge of the person of ordinary skill in the art ("POSITA").

The Nokia Demo was publically used and a video of the demonstration was published to YouTube on January 27, 2010. The Nokia Demo is prior art to the '697 patent under at least pre-AIA 35 U.S.C. § 102(a), (b) and (g). The Nokia Demo was not examined by the Patent Office during the prosecution of the '697 patent. Movold was filed at least as early as June 21, 2007 and published on June 5, 2008. Movold is prior art to the '697 patent under at least pre-AIA 35 U.S.C. § 102(a) and (b). Movold was not examined by the Patent Office during the prosecution of the '697 patent. Kim was filed at least as early as August 26, 2008 and published on March 8, 2010. Kim is prior art to the '697 patent under at least pre-AIA 35 U.S.C. § 102(a) and (b). Kim was not examined by the Patent Office during the prosecution of the '697 patent. Culbert was filed at least as early as December 28, 2007 and published on July 2, 2009. Culbert is prior art to the '697 patent under at least pre-AIA 35 U.S.C. § 102(a) and (b). Culbert was not examined by the Patent Office during the prosecution of the '697 patent. Huppi was filed at least as early as October 24, 2006 and published on April 5, 2007. Huppi is prior art to the '697 patent under at least pre-AIA 35 U.S.C. § 102(a) and (b). Huppi was not examined by the Patent Office during the prosecution of the '697 patent.

Google's contentions regarding where in the Nokia Demo each element of the Asserted Claims is found are provided in the following claim chart. In addition, Google expects to prove the disclosed contentions regarding the Nokia Demo with the above references and additional evidence, such as source code, testimony of percipient witnesses, and other contemporaneous documents regarding the development and commercialization of the system disclosed in the Nokia Demo.

As detailed in the claim charts below, the Nokia Demo anticipates the asserted claims under 35 U.S.C. § 102. In addition, the Nokia Demo in view of Movold and/or Kim and/or Culbert and/or Huppi, and/or the knowledge of a POSITA renders the asserted claims invalid as obvious under 35 U.S.C. § 103. A POSITA would have been motivated to combine the Nokia Demo with Movold and/or Kim and/or Culbert and/or Huppi because they are each related to the same or similar field of endeavor and each teaches methods and/or systems to address the same or similar problem in the field, namely the use of motion detection circuitry in electronic equipment, such as a mobile phone. Like, the Nokia Demo, Movold, Kim, Culbert, and Huppi relate to the same or similar fields. For example, Movold "relates to a contact-less user interface for electronic equipment that is capable of detecting movement of an object

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		 <p>(Nokia Demo at 0:59/1:14) (showing that the demonstrated radar system is in a mobile phone.)</p>
<p>1(a)</p>	<p>storing, in a mobile communications device, an association between a user notification alert and an event occurring at the mobile communications device;</p>	<p>The Nokia Demo alone or in combination with Movold and/or Kim and/or Culbert and/or Huppi, and/or the knowledge of a POSITA discloses or suggests “storing, in a mobile communications device, an association between a user notification alert and an event occurring at the mobile communications device.”</p> <p>The Nokia Demo discloses the use of radar technology in a mobile phone to control operations of the phone, such as volume, through the detection of hand gestures. <i>See</i>, 1(pre), <i>supra</i>. The a POSITA would have understood that a mobile phone, such as the one utilized in the Nokia Demo, would include one or more notification alerts that are associated with events occurring at the mobile communication device. For example, the skilled artisan would understand that a mobile phone, such as utilized in the Nokia Demo, would at</p>